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November 16, 2015

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: Halberstam v. Global
15 CV 5696 (BMC)**

Dear Judge Cogan:

I represent the plaintiff in the above matter. This letter shall serve as the parties' joint position statement in preparation for the conference scheduled for November 16, 2015 at 4:45 p.m.

PLAINTIFF'S STATEMENT

Being that there is no order that the parties are not absolved from filing a joint statement letter, plaintiff briefly sets forth the following.

Based upon prior conference before the Court, plaintiff respectfully concurs with the Court's analysis of the matter set forth in the Court's denial of defendant's application to adjourn the conference. Plaintiff agrees that the defendant needs probably at most two weeks to assemble the defendant's policies and procedures to initially turn over to the undersigned for analysis.

DEFENDANT'S STATEMENT

Defendant agrees that this case has only a few key pieces of evidence needed to resolve. In the interest of the upcoming holidays and logistics of obtaining the necessary documents, Defendant feels that a month would better suit gathering documents for Plaintiff's review and to discuss any possible settlement.

Thank you for the Court's consideration of the foregoing.

Yours faithfully,

/s/

Adam J. Fishbein